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November 27, 2001

Ms. Gloria Blue
Executive Secretary
Trade Policy Staff Committee
Office of the USTR
600 17th Street, NW
Washington, DC 20508**VIA ELECTRONIC MAIL**fr0001@ustr.gov**PUBLIC VERSION**Re: Response and Addition to Request for Exclusion of Products from Any Increased Duty, Tariff-Rate Quota, or Quantitative Restriction with Regard to Imports of Certain Steel

Dear Ms. Blue:

This submission is filed on behalf of Dana Corporation pursuant to the Federal Register notice entitled Trade Policy Staff Committee; Public Comments on the Potential action Under Section 203 of the Trade Act of 1974 With Regard to Imports of Certain Steel, 66 Fed. Reg. 54321 (October 26, 2001). In specific, on behalf of Dana, we are submitting comments supporting the November 15, 2001, request by Corus Steel BV and Corus Steel USA Inc., found at <http://www.ustr.gov/sectors/industry/steel201/X-072-corus.stalIBV.Corus%20Steel.pdf>, for exclusion from any relief imposed on the Section 201 investigation of certain steel with regard to steel 76" wide and wider.

Pursuant to 15 CFR 2003.6, Dana requests that certain information contained in this submission be treated as business confidential and not disclosed to the public. The specified information constitutes trade secrets, and commercial and financial information the disclosure of which is not authorized by Dana.

Dana requires this material for production of components destined for U.S. automotive OEM production. Dana had planned to use material produced by [

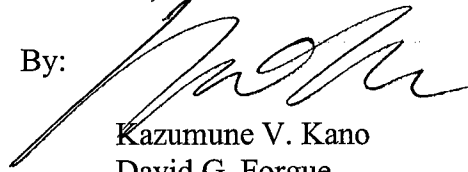
] ¹ a domestic source. However, Dana has since learned that [] has declared bankruptcy under Chapter 7 and will cease operations in December 2001. There is no other viable domestic source for this material.

If Dana is denied access to this material from overseas sources, it will have to suspend production. In turn, its automotive customer will also have to stop production of the model using the Dana product. Thus, both Dana and its customer will suffer severe harm with providing any relief to the U.S. industry.

Very truly yours,

BARNES, RICHARDSON & COLBURN

By:



Kazumune V. Kano
David G. Forgue

DAN-137

¹ This, and all subsequent deletions from this document, reflect the names of supplier(s) Dana has negotiated with in the past (commercial information).